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August 26, 1998

EX PARTE PRESENTATION

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Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *In the Matter of Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Oklahoma, CC Docket No. 97-121*

Dear Ms. Salas:

As part of the process established by the Common Carrier Bureau to informally discuss section 271 issues, on April 16, 1998, representatives of SBC Communications met with Bureau staff to discuss issues related to the interconnection checklist item (section 271(c)(2)(B)(i)). Following are responses to questions asked by staff in connection with the non-discriminatory provision of co-location of equipment necessary for interconnection or access to unbundled network elements pursuant to section 251(c)(6).

Question 1: In the 26 central offices in California that have no remaining co-location space, how many co-locators are currently physically located in those offices? In other words, what were the central offices' physical co-location capacities?

The vast majority of the 26 "exhausted" central offices have no physical co-location space due to space limitations, thus, in those offices, there are no physical co-locators. In the central offices that had physical co-location space, there are presently only one or two carriers physically co-locating, except one office (WLANCA01) where there are eight carriers physically co-located.

Question 2: Are there any central offices in Texas that have reached physical co-location capacity?

Presently, there is only one central office in Texas that has reached physical co-location capacity. It is a central office located in Dallas and is known as the "Farmer's Branch" office (DLLSTXFB). Relief is scheduled for this office in the fourth quarter of 1999.

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Question 3: Address the claim that it would cost \$600,000 to bring a copper cable from a CLEC's point of presence (POP) to a Pacific Bell central office, where an independent engineer estimated the project to cost only \$150,000.

The claim referenced in the staff's inquiry concerns Pacific Bell's handling of a facilities construction request made by NextLink Communications. The experience with NextLink is an example of a CLEC's misunderstanding of the facilities construction process and, perhaps, an example of miscommunication between NextLink and Pacific Bell. As CLECs enter the local market, there will inevitably be some miscommunication and misunderstanding; however, the parties must recognize that, as relations develop, initial start-up glitches will dissipate and eventually be eliminated.

NextLink's original request of Pacific Bell was "to bring copper pairs from nearby NextLink site to PacBell site IRVNCA11, due to unavailability of collocation space at this site." Pacific Bell's original quotation to NextLink was \$588,177.43 -- \$65,751.43 to develop the quote and \$522,426 to perform the construction and associated systems modifications required. The work included in the original construction quote can be broken down into two parts: (1) Outside Plant Construction (\$363,500) and (2) Software Upgrades and Modifications to Pacific Bell's mainframe computer systems to allow orders to pass from NextLink to Pacific Bell (\$158,926).

Further, the Outside Plant Construction priced by Pacific Bell included:

1. Four (4) ducts from the central office to the NextLink location (using the existing cable route)
2. Two (2) 3,600-pair copper cables from the central office to the NextLink location
3. Protectors and terminations on the central office frame
4. Frame and terminations on the NextLink premises.

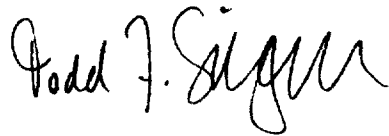
In a March 11, 1998 meeting with NextLink, Pacific Bell discussed the "independent engineer's" \$150,000 estimate for the project. The discrepancy between the two estimates was explained as follows: First, the NextLink estimate was based upon a different route footage between the sites. Pacific Bell explained that the existing route in the original quote was used for planning purposes, and if NextLink wanted a different route, possibly saving a few hundred feet, Pacific Bell could accommodate the request, provided there were no major problems with the proposed route. Second, the NextLink estimate was premised upon two 2,400-pair cables, which resulted in a large difference in the construction estimates. Pacific Bell had estimated the project using two 3,600-pair cables (as indicated above) in order to meet the two-year forecast provided by NextLink. The NextLink estimate would not have met the 1998 two-year forecast. Finally, the NextLink estimate did

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not consider the cost of terminating the cables on a frame in the Pacific Bell central office or for building a frame and terminating the cables at the NextLink location. Since the March 11 meeting, Pacific Bell and NextLink have discussed several alternatives to the original construction request, including a smaller co-location cage in a Pacific Bell central office and common cage co-location. Pacific Bell hopes to resolve this issue as soon as possible.

In accordance with the Commission's rules regarding ex parte presentations, an original and two (2) copies are provided herewith. Should you have any questions concerning the foregoing, please contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Todd F. Silbergeld". The signature is fluid and cursive, with the first name "Todd" and last name "Silbergeld" clearly distinguishable.

Todd F. Silbergeld
Director-Federal Regulatory

cc: Mr. M. Pryor
Ms. A. Wright